UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

ANDREW CORZO, SIA HENRY, ALEXANDER LEO-GUERRA, MICHAEL MAERLENDER, BRANDON PIYEVSKY, BENJAMIN SHUMATE, BRITTANY TATIANA WEAVER, and CAMERON WILLIAMS, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, CALIFORNIA
INSTITUTE OF TECHNOLOGY, UNIVERSITY
OF CHICAGO, THE TRUSTEES OF COLUMBIA
UNIVERSITY IN THE CITY OF NEW YORK,
CORNELL UNIVERSITY, TRUSTEES OF
DARTMOUTH COLLEGE, DUKE UNIVERSITY,
EMORY UNIVERSITY, GEORGETOWN
UNIVERSITY, THE JOHNS HOPKINS
UNIVERSITY, MASSACHUSETTS INSTITUTE
OF TECHNOLOGY, NORTHWESTERN
UNIVERSITY, UNIVERSITY OF NOTRE DAME
DU LAC, THE TRUSTEES OF THE
UNIVERSITY OF PENNSYLVANIA, WILLIAM
MARSH RICE UNIVERSITY, VANDERBILT
UNIVERSITY, and YALE UNIVERSITY,

Defendants.

Case No.: 1:22-cv-00125

Hon. Matthew F. Kennelly

PLAINTIFFS' MOTION TO RETAIN SEAL ON PLAINTIFFS' MOTION TO LIMIT REDACTIONS AS TO NORTHWESTERN UNIVERSITY AND YALE UNIVERSITY

On the May 8, 2023 at 9:36 pm ET, Plaintiffs filed a Motion to Limit Redactions As to Northwestern and Yale with attached exhibits. (ECF No. 355). These exhibits contained documents designated as Attorneys' Eyes Only pursuant to the Confidentiality Order, and the Motion contained quotations from these exhibits. Plaintiffs inadvertently filed the unredacted

Motion on the public docket. Upon discovery of the issue, Plaintiffs immediately left a voicemail with the Clerk of the Court requesting that the filing be placed under a temporary seal. On May 9 at 9:30 am ET, when the Court opened, Plaintiffs contacted Judge Kennelly's Chambers and

requested that the filing be placed under a temporary seal, which the Court completed

immediately.

Plaintiffs hereby move the Court to retain the seal pursuant to the Court's Confidentiality Order. (ECF No. 254).

1. (LCI 110. 254).

In support of its Motions, Plaintiffs state as follows:

1. Plaintiffs' Motion discusses, references, and appends certain information

designated as Confidential and Attorneys' Eyes Only under the terms of the Confidentiality

Order entered by this Court.

2. In accordance with Local Rule 26.2(c), Plaintiffs' Motion will continue to be

provisionally under seal, but an unredacted version will be provided to counsel and the Court.

Additionally, a redacted (public) version will be filed via the ECF system within 14 days.

WHEREFORE, Plaintiffs respectfully request that this Court retain the provisional

seal on Plaintiffs' Motion to Limit Redactions As to Northwestern University and Yale

University.

Dated: May 9, 2023

Respectfully Submitted,

By:/s/Robert D. Gilbert

Robert D. Gilbert

Elpidio Villarreal

Robert S. Raymar

Steven Magnusson

GILBERT LITIGATORS &

/s/ Edward J. Normand

Devin "Vel" Freedman

Edward J. Normand

Peter Bach-y-Rita

FREEDMAN NORMAND

FRIEDLAND LLP

2

COUNSELORS, P.C.

11 Broadway, Suite 615 New York, NY 10004 Phone: (646) 448-5269 rgilbert@gilbertlitigators.com pdvillarreal@gilbertlitigators.com rraymar@gilbertlitigators.com sschuster@gilbertlitigators.com amarquez@gilbertlitigators.com smagnusson@gilbertlitigators.com

Eric L. Cramer
Caitlin G. Coslett
BERGER MONTAGUE PC
1818 Market Street, Suite 3600
Philadelphia, PA 19103
Tel: 215-875-3000
ecramer@bm.net
ccoslett@bm.net

Richard Schwartz **BERGER MONTAGUE PC**1720 W Division
Chicago, IL 60622
Tel: 773-257-0255
rschwartz@bm.net

99 Park Avenue Suite 1910 New York, NY 10016 Tel: 646-970-7513 vel@fnf.law tnormand@fnf.law pbachyrita@fnf.law

Daniel J. Walker Robert E. Litan Hope Brinn BERGER MONTAGUE PC 2001 Pennsylvania Avenue, NW Suite 300 Washington, DC 20006 Tel: 202-559-9745 rlitan@bm.net dwalker@bm.net hbrinn@bm.net

Counsel for Plaintiffs